

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Manuel Medley

Case No. Case: 2:23-mj-30341  
Assigned To : Unassigned  
Assign. Date : 8/17/2023  
USA V. SEALED MATTER (CMP)(CMC)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 3, 2020, and July 10, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Unemployment insurance fraud scheme and has committed wire fraud
18 U.S.C. § 1028A	Aggravated identity theft

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 17, 2023

City and state: Detroit, Michigan

  
Complainant's signature

Miguel A. Colon Special Agent, DOL-OIG  
Printed name and title

  
Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge  
Printed name and title

## **AFFIDAVIT IN SUPPORT OF A COMPLAINT**

I, Miguel A. Colon, being first duly sworn, hereby depose and state as follows:

### **INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent of the U.S. Department of Labor, Office of Inspector General, Office of Investigations - Labor Racketeering and Fraud ("DOL-OIG/OI-LRF") and have been since December 2017. I am currently assigned to the Federal Bureau of Investigation ("FBI") Violent Gang Task Force ("VGTF") and the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") Violent Crimes and Gangs group where I participate in investigations of street gangs committing various violations of federal law, including weapons and narcotics trafficking, violent crimes, and fraud. Prior to my current assignment, I was assigned to the Homeland Security Investigations' Document and Benefit Fraud Task Force, where I investigated criminal activity including, but not limited to, identity theft, money laundering, visa fraud and other financial fraud. I have conducted numerous investigations involving identity theft, labor, financial and unemployment insurance fraud schemes. In addition to my experience, I

have also received significant law enforcement training, including graduating from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center.

2. As a Special Agent, I have conducted numerous investigations into criminal violations of both Title 29 and Title 18 of the United States Code. During this time, I have been either the lead agent or supporting agent on several investigations involving criminal schemes targeting the unemployment insurance (“UI”) program through the filing of false or fictitious UI claims. Based on my direct personal experience with these cases, I have become familiar with the methods that criminals use to attack and exploit the UI systems as well as the criminals’ reliance on the use of email and other internet or online tools and systems to facilitate that fraud.

3. Probable cause exists that Manuel Medley (DOB: XX-XX-2000) has engaged in an unemployment insurance fraud scheme and has committed wire fraud (18 U.S.C. § 1343) and aggravated identity theft (18 U.S.C. § 1028A). His scheme involves the filing of fraudulent UI claims through the internet, with some of those claims using misappropriated personal identifying information (“PII”) of real

persons, and the withdrawal of fraudulently obtained UI funds at ATMs in the Eastern District of Michigan, often using UI debit cards that were sent through the mail.

4. I make this affidavit based upon personal involvement in the subject criminal investigation, including review of financial, employment, internet service provider, utility and property records; records from relevant state agencies regarding UI claims; law enforcement surveillances; and information and evidence from search warrants in this investigation. I have also been provided with information from other law enforcement agents and officials, including agents and officials from the ATF, and various State Workforce Agencies. This affidavit does not contain all the facts developed to date in the underlying investigation and is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint and arrest warrant.

#### **BACKGROUND ON UNEMPLOYMENT INSURANCE**

5. The Social Security Act of 1935 initiated the federal and state Unemployment Insurance system. The system provides benefits to individuals who are unemployed for reasons beyond their control. The

purpose of the Unemployment Insurance system is twofold: first, to lessen the effects of unemployment through cash payments made directly to laid-off workers, and second, to ensure that life necessities are met on a weekly basis while the worker seeks employment. The U.S. Department of Labor funds many Unemployment Insurance Agency administrative costs, including salaries, office expenses, and computer equipment. The various state unemployment insurance agencies responsible for administering the UI programs are commonly referred to as State Workforce Agencies (“SWA”).

6. State unemployment systems and benefits are joint state and federal enterprises largely financed by taxes on private employers located in that state. In 2020 and 2021, the federal government provided significant supplemental benefits to the states as a result of the COVID-19 pandemic. Beginning in or about March 2020 and continuing through September 4, 2021, the Families First Coronavirus Response Act; Coronavirus Aid, Relief, and Economic Security Act; and the American Rescue Plan Act of 2021 created federal programs that allowed for the significant outlay of federal funds flowing to and through the states to offset the historic need for unemployment benefits

by the American workforce, including in the states of Arizona, California, Michigan, Pennsylvania, Maine, Kansas, Tennessee, New York and the US Territory of Guam (and in the Eastern District of Michigan). Collectively, these benefits are often referred to as Pandemic Unemployment Assistance (“PUA”).

7. Normally (in the absence of fraud), an unemployed worker initiates an Unemployment Insurance claim. This can be accomplished by submitting a claim in person, over the telephone, or via the Internet. Currently, most Unemployment Insurance claims in Arizona, California, Michigan, Pennsylvania, Maine, Kansas, Tennessee, New York and the US Territory of Guam are filed online via the Internet through the states’ UI portal. When a claimant using an internet protocol (“IP”) address registered in Michigan files a claim with an out-of-state UI agency, the servers used to process those claims are located outside the state of Michigan. For example, an Arizona or California UI claim filed from an IP address registered to a Michigan residence will be processed through a server located outside of the state of Michigan.

8. To be eligible for Unemployment Insurance benefits, the worker must demonstrate a certain level of earnings in several quarters

immediately preceding the application. The amount of benefits that an Unemployment Insurance claimant might be eligible for depends on a variety of factors, including but not limited to the length of his or her previous employment and the amount of wages he or she earned.

9. The State Workforce Agency will either approve or reject an Unemployment Insurance claim based on the application made by the unemployed worker. If the respective SWA approves an Unemployment Insurance claim, the claimant is required to re-certify the claim via telephone or Internet at various times during the life of the claim. The worker must also certify that he or she is still unemployed and actively seeking work. One way in which unemployment benefits are provided to a claimant is with a UI debit card, issued by the financial institution contracted by the respective state, which is mailed to the claimant through the U.S. Postal Service.

10. Alternatively, a claimant can provide the state Unemployment Insurance Agency with a bank routing number and bank account number so his or her Unemployment Insurance benefits can be transferred via electronic funds transfers (“EFTs”) into his or her bank account. All EFTs of Unemployment Insurance benefits to

Arizona, California, Michigan, Pennsylvania, Maine, Kansas, Tennessee, New York and the US Territory of Guam Unemployment Insurance claimants, involve the transmission of electronic signals through the various SWA and financial institution data servers. For example, all EFTs of Unemployment Insurance benefits to Michigan, California or Arizona Unemployment Insurance claimants, whether via a Bank of America (BOA)-provided debit card or a claimant-provided bank account, involve the transmission of electronic signals through one of BOA's two data centers, which are located in Virginia and Colorado, and from those data centers to banks and/or ATMs located, for example, in Michigan. In addition, any other state that disperses Unemployment Insurance benefits using BOA prepaid debit cards, including Arizona and California, also involve the transmission of electronic signals through the aforementioned BOA data centers. These are interstate wire communications.

### **PROBABLE CAUSE**

11. The United States Attorney's Office (USAO), ATF and DOL-OIG have been investigating criminal activity conducted by members and associates of the Detroit street gang, "Purple Heart Vets." As part



of that investigation, I identified Purple Heart Vet members, associates, and others who appeared to be engaged in unemployment insurance fraud schemes. During the investigation, I determined that Manuel Medley was associated with at least 40 suspected fraudulent UI claims between May 3, 2020, and July 10, 2021, in California, Arizona, Georgia, Kansas, Louisiana, Maryland, Nevada, New York, Pennsylvania, Rhode Island, Tennessee, Michigan, and the U.S. territory of Guam. This is based, in part, on the use of a common residential address—168XX Westbrook Street in Detroit, Michigan—as well as six UI claims filed in his own name in six separate states.

Unemployment Insurance Claims Linked to Medley

12. On May 14, 2020, a Michigan UI claim was filed in the name, DOB, and SSN of Manuel Medley. The phone number listed on the claim was 586-XXX-0054. The address listed by the claimant was 168XX Westbrook St., Detroit, MI. The email listed by the claimant was “manuel20medley@gmail.com.”

13. A law enforcement database revealed that address 168XX Westbrook St., Detroit, MI, is the registered address on Medley’s Michigan driver’s license.

14. On May 18, 2020, a Michigan UI claim was filed in the name, DOB, and SSN of a different Manuel Medley (DOB: XX-XX-1953). The bank account listed by the claimant for the disbursement of UI benefits was a Bancorp Bank account ending 5657. Records provided by Bancorp, which I have reviewed, revealed that the accountholder listed on the account was the subject, Manuel Medley (XX-XX-2000), which was confirmed by Medley's SSN and DOB registered on the account. In addition, the accountholder address listed on the account ending in 5657 was 168XX Westbrook St., Detroit, MI, the same address listed on Medley's May 14 Michigan UI claim and his driver's license.

15. Records provided by the Michigan Department of Health and Human Services revealed that the Manuel Medley listed on the May 18, 2020 Michigan UI claim (DOB: XX-XX-1953) has been deceased since 1989.

16. Probable cause exists that Medley committed wire fraud and aggravated identity theft in connection with the fraudulent UI claim filed in the deceased Manuel Medley's (DOB: XX-XX-1953) name. The filing of this claim involved an interstate wire transmission as it

was filed via the internet with the Michigan Unemployment Insurance Agency (MUIA). As referenced above, all EFTs of UI benefits to Michigan UI claimants, whether via a BOA-provided debit card or a claimant-provided bank account, involved the transmission of electronic signals through one of BOA's two data centers, which are located in Virginia and Colorado.

17. On June 9, 2020, an Arizona UI claim was filed in the name, DOB, and SSN of Manuel Medley. The bank account listed by the claimant for the disbursement of UI benefits was a Choice Bank account ending 2386. Records provided by Choice Bank, which I have reviewed, revealed that the accountholder listed on the account was subject Manuel Medley. In addition, the accountholder address listed on the account ending in 2386 was 168XX Westbrook St., Detroit, MI, the same address listed on Medley's May 14 Michigan UI claim and his driver's license.

18. On June 15, 2020, a Rhode Island UI claim was filed in the name, DOB, and SSN of Manuel Medley. The phone number listed on the claim was 586-XXX-0054. The email listed by the claimant was "manuel20medley@gmail.com." The bank account listed by the claimant

for the disbursement of UI benefits was a Bancorp Bank account ending in 5657, registered in Medley's name, the same account referenced in paragraph 14 above.

19. On June 17, 2020, an Arizona UI claim was filed in the name, DOB, and SSN of the deceased Manuel Medley (DOB: XX-XX-1953). The bank account listed by the claimant for the disbursement of UI benefits was a Choice Bank account ending in 2386, registered in subject Medley's name, SSN, and DOB, referenced in paragraph 17 above.

20. Probable cause exists that Medley committed wire fraud and aggravated identity theft in connection with the fraudulent UI claim filed in the deceased Manuel Medley's (DOB: XX-XX-1953) name. The filing of these claims involved an interstate wire transmission as it was filed via the internet with the Arizona DES, an agency located outside of Michigan. In addition, all EFTs of UI benefits to Arizona UI claimants, whether via a BOA-provided debit card or a claimant-provided bank account, involved the transmission of electronic signals through one of BOA's two data centers, which are located in Virginia and Colorado.

21. On July 6, 2020, a Pennsylvania UI claim was filed in the name, DOB, and SSN of Manuel Medley. The phone number listed on the claim was 586-XXX-0054. The address listed by the claimant was 168XX Westbrook St., Detroit, MI.

22. On July 20, 2020, a Georgia UI claim was filed in the name of Manuel Medley, but using the DOB and SSN of another individual. The phone number listed on the claim was 586-XXX-0054. The address listed by the claimant was 168XX Westbrook St., Detroit, MI.

23. On July 26, 2020, a California UI claim was filed in the name, DOB, and SSN of Manuel Medley. The phone number listed on the claim was 586-XXX-0054. The email listed by the claimant was “manuel20medley@gmail.com.” The address listed by the claimant was 168XX Westbrook St., Detroit, MI.

24. On October 29, 2020, a U.S. territory of Guam UI claim was filed in the name, DOB, and SSN of Manuel Medley. The bank account listed by the claimant for the disbursement of UI benefits was a Bancorp Bank account ending in 5657, registered in Medley’s name. The address listed by the claimant was 168XX Westbrook St., Detroit, MI.

UI Account in M.B's Name

25. On June 9, 2020, an Arizona UI claim was filed in the name, DOB, and SSN of M.B, whose identity is known to agents but withheld for privacy. The bank account listed by the claimant for the disbursement of UI benefits was a Choice Bank account ending in 2386, registered in Medley's name.

UI Account in J.B's Name

26. On July 10, 2020, a Pennsylvania UI claim was filed in the name, DOB, and SSN of J.B, whose identity is known to agents but withheld for privacy. The phone number listed on the claim was 586-XXX-0054. The email listed by the claimant was "manuel20medley@gmail.com." The address listed by the claimant was 168XX Westbrook St., Detroit, MI.

UI Account in A.G.'s Name

27. On July 10, 2020, a Pennsylvania UI claim was filed in the name, DOB, and SSN of A.G, whose identity is known to agents but withheld for privacy. The phone number listed on the claim was 586-XXX-0054. The email listed by the claimant was

“manuel20medley@gmail.com.” The address listed by the claimant was 168XX Westbrook St., Detroit, MI.

28. A follow-on query of UI claims associated with 168XX Westbrook St., Detroit, MI, revealed that between May 3, 2020 and July 10, 2021, this address was listed as the claimant address on 34 separate UI claims in 11 states, including the claims referenced above. Figure 1 below illustrates a sample of the UI claims associated with address 168XX Westbrook St., Detroit, MI, and the claims filed in Medley’s name. Based on my training, experience, and knowledge of the investigation, I believe that these claims, which share common fraud indicators, were submitted as part of Medley’s scheme to defraud.

Figure 1.

Claim State	Name	Email	Phone	Claim Date	Address
AZ	MEDLEY, MANUEL	RICHTRITRI1234@GMAIL.COM	586XXX0053	6/9/2020	5132 W SANDRA TER, GLENDALE, AZ
AZ	MEDLEY, MANUEL	MANUELMEDLEY@GMAIL.COM	313XXX7535	6/17/2020	3200 AVE, PHOENIX, AZ
CA	MEDLEY, MANUEL	MANUEL20MEDLEY@GMAIL.COM	586XXX0054	7/26/2020	16830 WESTBROOK ST, DETROIT, MI
GA	MEDLEY, MANUEL	MANUELMEDLEY7@GMAIL.COM	586XXX0054	7/20/2020	16830 WESTBROOK ST, DETROIT, MI
GU	MEDLEY, MANUEL	TRICOLE935@GMAIL.COM	269XXX4195	10/29/2020	16830 WESTBROOK ST, DETROIT, MI
MI	MEDLEY, MANUEL	MEDLEY.MANUEL@YAHOO.COM	313XXX9545	5/18/2020	19021 MITCHELL ST, DETROIT, MI
MI	MEDLEY, MANUEL	MANUEL20MEDLEY@GMAIL.COM	586XXX0054	5/14/2020	16830 WESTBROOK ST, DETROIT, MI
PA	MEDLEY, MANUEL	MANUEL18MEDLEY@GMAIL.COM	586XXX0054	7/6/2020	16830 WESTBROOK ST, DETROIT, MI
RI	MEDLEY, MANUEL	MANUEL20MEDLEY@GMAIL.COM	586XXX0054	6/15/2020	37 SARAH TEFT DR, WARWICK, RI

CA	B____, K____	D0UGHLONGWAY@ICLOUD.COM	313XXX8506	7/20/2020	16830 WESTBROOK ST, DETROIT, MI
CA	H____, T____	TATYHOUS232@GMAIL.COM	313XXX7635	7/10/2021	16830 WESTBROOK ST, DETROIT, MI
CA	D____, S____	S*****DOOLEY10@GMAIL.COM	248XXX1778	10/22/2020	16830 WESTBROOK ST, DETROIT, MI
GA	B____, C____	C****B****717@GMAIL.COM	313XXX6098	7/21/2020	16830 WESTBROOK ST, DETROIT, MI
GA	P____, B____	MANUELMEDLEY7@GMAIL.COM	586XXX0054	7/20/2020	16830 WESTBROOK ST, DETROIT, MI
KS	J____, J____	BGREG0683@GMAIL.COM	313XXX6093	9/3/2020	16830 WESTBROOK ST, DETROIT, MI
KS	P____, E____	K***B***@GMAIL.COM	313XXX8506	8/15/2020	16830 WESTBROOK ST, DETROIT, MI
KS	H____, D____	K***DAVIS@GMAIL.COM	313XXX8506	8/15/2020	16830 WESTBROOK ST, DETROIT, MI
LA	G____, J____	K***B***@GMAIL.COM	313XXX8506	8/18/2020	16830 WESTBROOK ST, DETROIT, MI
MI	D____, S____	S*****DOOLEY10@GMAIL.COM	248XXX1778	5/16/2020	16830 WESTBROOK ST, DETROIT, MI
MI	W____, T____	WTONY767@GMAIL.COM	313XXX6771	5/11/2020	16830 WESTBROOK ST, DETROIT, MI
NV	G____, A____	K**H**2020@GMAIL.COM	616XXX7884	8/4/2020	16830 WESTBROOK ST, DETROIT, MI
NY	S____, W____	MOEWANASI@GMAIL.COM	313XXX6093	10/13/2020	16830 WESTBROOK ST, DETROIT, MI
NY	R____, D____	TRICOLE935@GMAIL.COM	313XXX6638	2/16/2021	16830 WESTBROOK ST, DETROIT, MI
PA	M____, O____	*****MEDLEY21@GMAIL.COM	810XXX7783	6/28/2021	16830 WESTBROOK ST, DETROIT, MI
PA	B____, J____	MANUEL20MEDLEY@GMAIL.COM	586XXX0054	7/10/2020	16830 WESTBROOK ST, DETROIT, MI
PA	H____, K____	K**H**2020@GMAIL.COM	616XXX7894	7/17/2020	16830 WESTBROOK ST, DETROIT, MI
PA	G____, A____	MANUEL20MEDLEY@GMAIL.COM	586XXX0054	7/10/2020	16830 WESTBROOK ST, DETROIT, MI
PA	J____, S____	JAYPOOOOOOOH97@GMAIL.COM	313XXX7830	2/16/2021	16830 WESTBROOK ST, DETROIT, MI
PA	B____, J____	L***J***22@GMAIL.COM	810XXX7783	6/26/2021	16830 WESTBROOK ST, DETROIT, MI
PA	G____, J____	MANUEL20MEDLEY@GMAIL.COM	586XXX0054	7/16/2020	16830 WESTBROOK ST, DETROIT, MI
TN	S____, S____	CB87488@GMAIL.COM	313XXX3555	10/19/2020	16830 WESTBROOK ST, DETROIT, MI
AZ	B____, M____	TRIONNAHD224@GMAIL.COM	313XXX3534	6/9/2020	7404 E OSAGE AVE, MESA, AZ

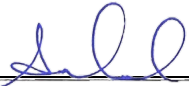
## CONCLUSION

29. Based on the forgoing, there is probable cause to believe that Manuel Medley has committed wire fraud (18 U.S.C. § 1343) and



aggravated identity theft (18 U.S.C. § 1028A) in connection with a scheme to defraud the federal/state unemployment insurance programs and obtain unemployment benefits by means of false and fraudulent pretenses and representations.

Respectfully submitted,




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Miguel A. Colon  
Special Agent  
U.S. Department of Labor  
Office of Inspector General

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 17, 2023



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Hon. Kimberly G. Altman  
United States Magistrate Judge